Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 74.1235 regarding ERP limitation for FM translator stations. Specifically, the charts in Section 74.1235(1) and 74.1235(2) have no logical reason to discriminate on geographic area. There may have been some logic decades ago for having differing translator ERP limits east and west of the Mississippi river, but those have long been forgotten and the great disparity still exists in the rules.

Create a definition for translator ERP limitation that is fair and consistent for all signals, regardless of geographic location.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services